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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIUS SMITH WILLIAMS (AKA  
"JOCKO"),  
JAMAL PERRY,  
JOSEPH JOE, III,  
WILLIAM HOWELL (AKA "RELL")  
TERRY MARLOWE,  
EMMETT CONNER, SR.,  
STERLING GREEN,  
KEISHA JOHNSON,  
KAYLA NEELEY,  
ISIAH PATTERSON, SR.,  
DONALD WASHINGTON, JR.,  
TERRENCE PHILLIPS,  
STEVE CROOM, JR.,  
CRYSTAL JEFFERSON,  
DULCINEA PURDUE,  
TERRANCE HOWARD,  
COBIE PHILLIPS, JR.,  
RAY WYNN,  
JERMAINE DONLOW, and  
SEMIRA STONE

Defendants.

INDICTMENT

4:17 CR 328  
CASE NO.

Title 18, Sections 1349, 1956(h),  
United States Code

**JUDGE PEARSON**

The Grand Jury charges:

**General Allegations**

At all times material to this Indictment:

1. Defendants established and maintained bank accounts at the following financial institutions, among others: Bank of America, which was headquartered in Charlotte, North Carolina; Citizens Bank, formerly known as Charter One Bank, which was headquartered in

Providence, Rhode Island; Cooper State Bank (“Cooper Bank”), which was headquartered in Dublin, Ohio; Cortland Bank, which was headquartered in Cortland, Ohio; Fifth Third Bank, which was headquartered in Cincinnati, Ohio; First National Bank, which was headquartered in Hermitage, Pennsylvania; Home Savings and Loan, which was headquartered in Youngstown, Ohio; Huntington National Bank (“Huntington Bank”), which was headquartered in Columbus, Ohio; JP Morgan Chase (“Chase”), which was headquartered in New York, New York; Key Bank, which was headquartered in Cleveland, Ohio; PNC Bank, which was headquartered in Pittsburgh, Pennsylvania; Regions Bank, which was headquartered in Birmingham, Alabama; Talmer Bank & Trust, formerly known as First Place Bank (“Talmer Bank”), which was headquartered in Troy, Michigan; US Bank, which was headquartered in Minneapolis, Minnesota; and Wells Fargo Bank (“Wells Fargo”), which was headquartered in San Francisco, California.

2. Bank of America, Citizens Bank, Cooper Bank, Cortland Bank, Fifth Third Bank, First National Bank, Home Savings and Loan, Huntington Bank, Chase, Key Bank, PNC Bank, Regions Bank, Talmer Bank, US Bank, and Wells Fargo (collectively, the “financial institutions”) were insured by the Federal Deposit Insurance Corporation, and their activities affected interstate commerce.

3. Any time money was transferred via wire to or from an account at these financial institutions, including to or from accounts opened at their branch offices located in Ohio, to or from an account at another financial institution, information was transmitted by means of wire communication between the financial institutions’ headquarters.

The Grand Jury further charges:

**Factual Allegations**

**A. Overview of the Conspiracy**

4. The Defendants and other conspirators (collectively, the “conspirators”) were part of a transnational criminal organization operating in the United States, Canada, and Africa, among other locations. Through a variety of fraud and identity theft schemes, the conspirators obtained information relating to the financial accounts and business transactions of law firms, financial institutions, business entities, and individuals. The conspirators defrauded their victims by tricking them into believing they were engaging in legitimate business or financial transactions, when in fact they were not, and causing the victims to unwittingly transfer money to bank accounts the conspirators controlled. After obtaining the victim funds, the conspirators transferred the money through multiple financial institutions, including institutions located overseas, to conceal and disguise the source of, and hinder efforts to locate, those proceeds.

5. Z.H. was a mid-level operator in the criminal organization. He primarily operated in and around Youngstown, Ohio, Columbus, Ohio, and Atlanta, Georgia. In furthering the organization’s fraud and money laundering operations, Z.H. took direction and received information from conspirators operating from Canada, Africa, and other parts of the United States. In the criminal organization, Z.H. was responsible for, among other things, recruiting and managing a network of lower-level conspirators that, at Z.H.’s direction, established shell companies and business bank accounts used to receive and launder proceeds of the fraud schemes.

6. Z.H. recruited a wide network of conspirators in Youngstown and elsewhere to participate in the conspiracy to defraud and to launder proceeds of the fraudulent activity. At

Z.H.'s request, conspirators established and maintained bank accounts in the name of shell corporations that had no legitimate business activity. The conspirators Z.H. recruited to open bank accounts typically had no knowledge of, or connection to, the shell companies.

7. The conspirators typically established the bank accounts at financial institutions in and around Youngstown, Ohio, Columbus, Ohio, and Atlanta, Georgia. At times, Z.H. transported and recruited other conspirators to transport conspirators that opened bank accounts in the name of shell companies. At other times, Z.H. arranged trips among conspirators to Atlanta and other cities for the purpose of establishing bank accounts to receive and launder proceeds of the organization's fraudulent activities.

8. After establishing the bank accounts, the conspirators provided Z.H. the account information and any bank-issued debit cards so that Z.H. and others could access and monitor the balances in these accounts. Z.H. transferred the account information to conspirators in Canada and elsewhere, who further distributed the information among conspirators through email and other means. Z.H. and other conspirators in Canada and elsewhere used one or more of the bank accounts as the initial destination for victim funds that were diverted through fraudulent transactions that victims thought were legitimate. After victim funds were transferred into the bank accounts, Z.H. directed conspirators he recruited in his network to transfer and attempt to transfer the proceeds of the fraud schemes out of the accounts, typically via multiple smaller transactions designed to conceal and disguise the source of the proceeds and hinder efforts to recover them. At times, the conspirators, at Z.H.'s direction, made substantial cash withdrawals from the bank accounts, often structuring the withdrawals in a way designed to avoid federal cash transaction reporting requirements. The conspirators also shared in the proceeds of the fraud schemes, typically commensurate with their respective roles.



## **B. The Scheme to Defraud**

9. As part of an overall scheme to defraud, the conspirators engaged in a wide variety of fraud and identity theft schemes designed to dupe unsuspecting law firms, business entities, and individuals into thinking they were engaging in legitimate business or financial transactions, when in fact they were not. These schemes took several forms, including, among others, the following:

### **1. The Real Estate Attorney Scheme**

10. The conspirators targeted and defrauded real estate attorneys and law firms by posing as the attorneys' actual clients and fraudulently diverting client money. Through computer hacking and other means, the conspirators identified an upcoming real estate transaction in which a real estate attorney was involved on behalf of a client. Shortly before the closing date for the real estate transaction, the conspirators created a spoofed email account nearly identical to that of the actual client account and began communicating with the attorney purporting to be the actual client. Posing as the actual client, the conspirators informed the attorney that the client had changed his or her banking information and directed the proceeds from the real estate transaction to be transferred to a new account that the conspirators controlled. Following the closing of the real estate transaction, the attorney, relying on what he or she believed to be the actual client's direction, transferred the funds to the new account. The conspirators then transferred or withdrew the funds immediately, thereby obtaining the fraudulent proceeds before the attorney and the actual client discovered what occurred.

### **2. The Debt Collection Attorney Scheme**

11. The conspirators targeted and defrauded debt collection attorneys by causing the attorneys to deposit unwittingly altered or counterfeit retainer checks into their client trust

accounts and then wire funds from the account. The conspirators initiated the scheme by sending a bulk mailing to a debt collection attorney, posing as a potential client, seeking to retain the attorney as part of a purported collection matter. Shortly after engaging the attorney, the conspirators typically contacted the attorney and falsely explained that they had independently reached a settlement with the purported debtor and that a settlement check from the debtor would be arriving to the attorney. After receiving what the attorney believed to be a legitimate settlement check, the attorney, relying on what he or she believed to be the good faith direction of the client, immediately wired the funds according to the purported client's directions. After the funds were wired to bank accounts the conspirators controlled, the conspirators transferred or withdrew the funds immediately. Typically, after the conspirators had already gained control of the proceeds, the attorney's financial institution contacted the attorney and informed him or her that the settlement check was an altered or counterfeit check and that the financial institution dishonored the check and reversed any corresponding credit to the account. In many instances, the attorney was unable to recover the funds he or she transferred, thereby causing the attorney substantial financial losses.

### **3. The Real Estate and Large Equipment Escrow Scheme**

12. The conspirators targeted and defrauded title companies and escrow agents (collectively, the "escrow services") related to purported sales of real property and heavy equipment. The conspirators initiated the scheme by sending a bogus purchase agreement (the "agreement") to an escrow service related to the purported sale of a particular property or piece of machinery, requesting that the escrow service function as the closing agent for the sale. The agreement typically provided that the purchaser would make an initial deposit towards the purchase of the property or equipment (the "earnest money"), and that upon authorization from

the purchaser, the escrow service would release the earnest money to the seller. The conspirators then sent and caused to be sent an altered or counterfeit check to the escrow service that purported to be earnest money. Next, the conspirators, posing as the purchaser, sent and caused to be sent an email to the escrow service falsely claiming that the inspection of the property or equipment had been completed and requesting release of the earnest money to the seller. Thereafter, conspirators, posing as the seller, provided wire instructions for the earnest money. Relying on what it believed to be the good faith direction of the parties to the agreement, the escrow service immediately wired the funds according to the parties' directions. After the funds were wired to bank accounts the conspirators controlled, the conspirators transferred or withdrew the funds immediately. Typically, after the conspirators had already gained control of the proceeds, the escrow service's financial institution contacted the escrow service and informed it that the earnest money check was an altered or counterfeit check and that the financial institution was dishonoring the check and reversing any corresponding credit to the account. In many instances, the escrow service was unable to recover the funds it transferred, thereby causing it substantial financial losses.

#### **4. The Romance Scheme**

13. Conspirators targeted and defrauded users of internet dating and social networking sites. The conspirators, posing as fictitious individuals, feigned romantic relationships with those users and created fictitious scenarios in which the users needed to wire funds to the conspirators in order to further advance and culminate these relationships.

#### **5. The Web-based Financial Account Takeover Scheme**

14. The conspirators stole and otherwise obtained, without lawful authority, the web credentials for individual victims' online financial accounts. After obtaining the web credentials

and logging into a victim's financial account, the conspirators initiated unauthorized wire transfers into bank accounts the conspirators controlled and then transferred or withdrew the funds immediately.

#### **6. The Personal Email Account Takeover Scheme**

15. The conspirators stole and otherwise obtained, without lawful authority, the email credentials for individual victims' personal email accounts. After obtaining the credentials and logging into a victim's email account, the conspirators typically sent and caused to be sent an email to the victim's financial institution requesting to initiate unauthorized wire transfers. The conspirators submitted to the financial institution a wire transfer request form with a forged signature of the victim. In order to decrease the chance of the financial institution discovering the fraud, the conspirators typically caused the victim funds to be transferred to a bank account the conspirators controlled in the same or similar name as the victim. After the funds were wired to a bank account the conspirators controlled, the conspirators then transferred or withdrew the funds immediately, before the individual victim or his or her respective financial institution discovered the fraud.

#### **7. The Fraudulent Business Email Scheme**

16. By hacking or spoofing business email accounts, the conspirators sent and caused to be sent bogus emails purporting to be from a high-level executive or key personnel at an organization to a key individual responsible for finances inside the organization. The email requested a wire transfer to a designated bank account, which, in actuality, the conspirators controlled. The email typically claimed that the wire transfer request related to a sensitive corporate matter (such as a large purchase or acquisition) and was urgent. After the funds were wired to a bank account the conspirators controlled, the conspirators then transferred or withdrew

the funds immediately, before the individual victim or its respective financial institution discovered the fraud.

The Grand Jury further charges:

**COUNT 1**  
**(Conspiracy to Commit Wire Fraud, 18 U.S.C. § 1343,  
and Bank Fraud, 18 U.S.C. § 1344(2), in violation of 18 U.S.C. § 1349)**

17. The factual allegations of paragraphs 1 through 16 of this Indictment are realleged and incorporated by reference as if fully set forth herein.

18. From in or around September 2012, and continuing through approximately December 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants JULIUS SMITH WILLIAMS (AKA "JOCKO"), JAMAL PERRY, JOSEPH JOE, III, WILLIAM HOWELL (AKA "RELL"), TERRY MARLOWE, EMMETT CONNER, SR., STERLING GREEN, KEISHA JOHNSON, KAYLA NEELEY, ISIAH PATTERSON, SR., DONALD WASHINGTON, TERRENCE PHILLIPS, STEVE CROOM, JR., CRYSTAL JEFFERSON, DULCINEA PURDUE, TERRANCE HOWARD, COBIE PHILLIPS, JR., RAY WYNN, JERMAINE DONLOW, SEMIRA STONE, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other to:

- a. devise and intend to devise a scheme and artifice to defraud law firms, investment firms, other business entities, and individuals who believed they were engaging in legitimate business and financial transactions, and to obtain money and property from such entities and persons by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the scheme and artifice to defraud cause to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds, in violation of Title 18, United States Code, Section 1343; and
- b. by means of materially false and fraudulent pretenses, representations, and promises, knowingly execute and attempt to execute a scheme and artifice

to obtain any of the moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution, in violation of Title 18, United States Code, Section 1344(2).

**Object of the Conspiracy**

19. The objects of the conspiracy were to:
- a. enrich Defendants and their co-conspirators by causing law firms, investment firms and financial institutions, other business entities, and individuals to engage in business and financial transactions that representatives of the various entities and individuals thought were legitimate but, in truth and in fact, fraudulently diverted large amounts of money to bank accounts that the conspirators controlled;
  - b. use financial institutions to obtain the fraudulently diverted money; and
  - c. obstruct the investigation and prosecution of the conspirators.

**Manner and Means of the Conspiracy**

20. The manner and means by which the conspirators sought to accomplish the conspiracy included, among others, the following:

- a. Conspirators participated in a wide variety of fraud schemes, including, but not limited to, those referenced herein, as part of a transnational criminal organization, operating in the United States, Canada, and Africa, among other locations;
- b. Conspirators used emails, financial wire transfers, and other interstate wire communications to defraud law firms, investment firms, other business entities, and individuals across the United States and obtain funds from them by means of materially false and fraudulent pretenses and representations;
- c. Conspirators, through computer intrusion and email spoofing schemes, romance schemes, and otherwise, obtained information relating to their victims' business activities, financial accounts, and financial transactions;
- d. Conspirators incorporated and caused to be incorporated shell companies with fictitious names, sometimes including a victim's name into the shell company name, then opened and caused to be opened bank accounts in the names of those shell companies at various federally-insured financial institutions in the Northern District of Ohio and elsewhere, and provided each other information about and access to these accounts;

- e. Conspirators opened and caused to be opened bank accounts, in the names of existing business entities they controlled and names similar to their own individual names, at various federally-insured financial institutions in the Northern District of Ohio and elsewhere, and provided each other information about and access to these accounts;
- f. Conspirators provided each other information about and access to other preexisting bank accounts they controlled at various federally-insured financial institutions in the Northern District of Ohio and elsewhere;
- g. Conspirators made false representations to financial institution representatives about the purpose for which banks accounts were opened and maintained and the source and destination of funds;
- h. Conspirators used various methods to trick their victims into transferring money, often across state lines, to bank accounts the conspirators controlled, including:
  - i. The Real Estate Attorney Scheme;
  - ii. The Debt Collection Attorney Scheme;
  - iii. The Real Estate and Large Equipment Escrow Scheme;
  - iv. The Romance Scheme;
  - v. The Web-based Financial Account Takeover Scheme;
  - vi. The Personal Email Account Takeover Scheme;
  - vii. The Fraudulent Business Email Scheme; and
  - viii. Other Schemes;
- i. Conspirators traveled and transported others to bank branches in the Northern District of Ohio and elsewhere, including bank branches located in different states, to conduct transactions in accounts that received fraudulently obtained funds;
- j. Conspirators withdrew and caused to be withdrawn portions of the victim funds from bank accounts to which the funds had been fraudulently transferred and used the funds to enrich themselves;
- k. Conspirators caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds, to and from the Northern District of Ohio and elsewhere, including:



- i. wire transfers of victim funds to bank accounts conspirators controlled;
  - ii. email communications with victims;
  - iii. email communications, text messages, and text images between co-conspirators directing opening of accounts, passing account information, and directing movement of fraudulently obtained funds;
  - iv. telephone calls to financial institutions to inquire about accounts conspirators controlled; and
  - v. accessing internet banking to check balances in accounts the conspirators controlled; and
1. Conspirators coordinated to provide false statements to law enforcement regarding the conspiracy's activities in order to obstruct the investigation and prosecution of the conspirators.

**Acts in Furtherance of the Conspiracy**

21. In furtherance of the conspiracy and to effect its unlawful object, Defendants committed, and caused to be committed, the following acts in furtherance of the conspiracy in the Northern District of Ohio, and elsewhere:

**Julius Smith Williams**

22. On or about September 18, 2014, WILLIAMS opened a business checking account ending in #2900 in the corporate name of JMS International LLC at Huntington Bank in Youngstown, Ohio.

23. Also on or about September 18, 2014, WILLIAMS opened a business checking account ending in #7560 in the corporate name of JMS International LLC at Citizens Bank in Youngstown, Ohio.

24. After opening the accounts, WILLIAMS and others provided the account information to the conspirators.

25. On or about September 22, 2014, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to davidmark468@ymail.com providing the names “JMS International LLC” and “Wholesale Goods.”

26. On or about September 24, 2014, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to davidmark468@ymail.com providing account information for the Citizens Bank account ending in #7560.

27. Also on or about September 24, 2014, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to jhclive@aol.com with the subject line, “Use.” The text of the email included account information for the Huntington Bank account ending in #2900. Also included in the email was another email from ikelo1010@yahoo.ca to hallmark\_f@yahoo.ca on or about August 26, 2014, which included account information for the Huntington Bank account ending in #3835 in the name of Patri Global Enterprise LLC, which account was controlled by the conspirators.

28. On or about September 24, 2014, the conspirators, through a spoofed email in which the conspirators posed as the actual financial account holder, attempted to cause an unauthorized wire transfer of approximately \$200,000 from the intended victim’s account into a Chase Bank account ending in #7831 in the name of JMS International.

29. On or about October 15, 2014, the conspirators caused a wire transfer of approximately \$60,000 into the Citizens Bank account ending in #7560, which funds were fraudulently diverted from a law firm in West Palm Beach, Florida.

30. On or about October 17, 2014, WILLIAMS opened a business checking account ending in #3401 in the corporate name of JMS International LLC at US Bank in Youngstown, Ohio.

31. After opening the account, WILLIAMS and others provided the account information to the conspirators.

32. On or about October 20, 2014, the conspirators caused a wire transfer of approximately \$200,000 into the US Bank account ending in #3401, which funds were fraudulently diverted from a law firm in Hudsonville, Michigan involved in a transaction regarding a purported sale of an oil rig.

33. On or about October 29, 2014, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to kmj6149@yahoo.com with the subject line, "Accounts[.]" The text of the email included, among other things, account information for multiple bank accounts in the name of JMS International at SunTrust Bank and Regions Bank.

34. On or about January 10, 2015, the conspirators sent and caused to be sent an email from rnip234@yahoo.com to ikelo1010@yahoo.ca with the subject, "This are d names for the aza." The text of the email included a list, shown as: "1: [R.L.] 2: [M.H.] 3: [T.S.] 4: TOYOTA TSUSHO PETROLEUM PTE LTD 5: Chimbusco Pan Nation Petro-Chemical Co., LLC."

35. On or about January 12, 2015, the conspirators incorporated and caused to be incorporated the business Toyota Tshusho Petroleum in Ohio.

36. On or about January 12, 2015, the conspirators sent and caused to be sent an email from tmg44504@gmail.com to tagummedia@gmail.com. The email included three attachments, which set forth IRS employer identification forms and other information for several companies, as follows: Toyota Tsusho Petroleum LTD Co. (Julius Williams Sole MBR, 100 6<sup>th</sup> St NE, Atlanta, GA 30308, ID Num: 47-2758827), [R.A.L.] ([R.H.] Sole MBR, 201 17<sup>th</sup> Street

NW Ste 300, Atlanta, GA 30363, ID Num: 47-2759843), and Thomas Spackman LLC (William Howell Sole MBR, 2450 Camellia Lane NE, Atlanta, GA 30324, ID Num: 47-2759003).

37. On or about January 27, 2015, WILLIAMS opened a business checking account ending in #2015 in the name of Toyota Tsusho Petroleum LTD at First National Bank in the Youngstown, Ohio area.

38. After opening the account, WILLIAMS and others provided the account information to the conspirators.

39. On or about February 10, 2015, WILLIAMS, Z.H., and others travelled from Ohio to Atlanta, Georgia.

40. On or about February 10, 2015, WILLIAMS opened a business checking account ending in #4405 in the name of Toyota Tsusho Petroleum LTD at Bank of America in Atlanta, Georgia.

41. After opening the account, WILLIAMS and others provided the account information to the conspirators.

42. On or about February 10, 2015, the conspirators sent and caused to be sent an email from [tru.levi@ymail.com](mailto:tru.levi@ymail.com) to [beamish@yahoo.com](mailto:beamish@yahoo.com) stating, "Toyota Tsusho Petroleum LTD Co. 100 6<sup>th</sup> St NE Atlanta, GA 30308."

43. On that same date, conspirators also sent and caused to be sent emails from [tru.levi@ymail.com](mailto:tru.levi@ymail.com) to [beamish@yahoo.com](mailto:beamish@yahoo.com) with account information for the Bank of America account ending in #9923, controlled by conspirator Paul Lacey (previously charged), and the Regions Bank account ending in #1827, controlled by WILLIAM HOWELL.

44. Between on or about February 19, 2015, and February 23, 2015, the conspirators sent and caused to be sent emails between each other containing, among other things, account information for the Bank of America account ending in #4405.

45. In February 2015, the conspirators attempted to fraudulently divert funds from real estate attorneys and escrow service companies located in several states and have the funds directed into the Bank of America account ending in #4405.

46. On or about March 6, 2015, WILLIAMS, Z.H., and HOWELL flew from Atlanta, Georgia to Pittsburgh, Pennsylvania.

47. On or about March 10, 2015, the conspirators attempted to cause a wire transfer of approximately \$200,000 into the Bank of America account ending in #4405, which funds were fraudulently diverted from a law firm in Homer, New York involved in a transaction regarding the purported purchase of an oil rig drill.

48. On or about March 12, 2015, the conspirators caused a wire transfer of approximately \$195,000 into the First National Bank account ending in #2015, which funds were fraudulently diverted from a title company in Rockwell, Texas involved in a purported real estate transaction.

49. On or about March 12, 2015, the conspirators sent and caused to be sent an email from [ikelo1010@yahoo.ca](mailto:ikelo1010@yahoo.ca) to [davidmark468@ymail.com](mailto:davidmark468@ymail.com) with the subject line, "FW:Acct." The text of the email provided bank details as follows: "First National Bank 5632 Mahoning Ave Austintown, OH 44515 Act# #####2015 RT# #####8092."

50. On or about May 15, 2015, the conspirators caused a wire transfer of approximately \$190,000 into the Bank of America account ending in #4405, which funds were

fraudulently diverted from a law firm in Casper, Wyoming involved in a transaction regarding the purported sale of drilling rig equipment.

**Jamal Perry**

51. On or about October 23, 2013, PERRY opened a business checking account ending in #4200 in the name of Sally Green Brokerage at Huntington Bank in Youngstown, Ohio.

52. On that same date, PERRY opened a business checking account ending in #1612 in the name of Sally Green at Citizens Bank in Youngstown, Ohio.

53. After opening the accounts, PERRY and others provided the account information to the conspirators.

54. On or about October 28, 2013, and November 13, 2013, the conspirators sent and caused to be sent emails from ikelo1010@yahoo.com to koskos374@yahoo.com providing the account information for the Huntington Bank account ending in #4200.

55. On or about December 2, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to bmoCHASE@gmail.com with the subject line, "Account info[.]" The text of the email included account information for the Citizens Bank account ending in #1612.

56. On or about March 17, 2014, the conspirators sent and caused to be sent an email from levelplace@yahoo.com to plstrustgod@yahoo.com with the subject line, "AZA[.]" The text of the email included account information for the Citizens Bank account ending in #1612.

57. On or about April 25, 2014, PERRY opened a business checking account ending in #5133 in the name of R.L. at Bank of America in the Atlanta, Georgia area.

58. After opening the account, PERRY and others provided the account information to the conspirators.

59. On or about May 13, 2014, at approximately 4:21 p.m., the conspirators sent and caused to be sent an email from beamish10@yahoo.com to vickentraders@aol.com with the subject line, "Account 3[.]" The text of the email included account information for a purported account in the name of R.L. at Wells Fargo.

60. On or about May 13, 2014, at approximately 4:22 p.m., vickentraders@aol.com replied to beamish10@yahoo.com with the subject line, "Re: Account 3[.]" The text of the email stated, "It said both of those names that you sent me is on the DO NOT send list. Who are these people please. THis [sic] is what my daughter just told me now also."

61. On or about May 13, 2014, at approximately 4:22 p.m., vickentraders@aol.com replied to beamish10@yahoo.com with the subject line, "Re: Account 3[.]" The text of the email stated, "Is this where you want the \$500 to go?"

62. On or about May 13, 2014, at approximately 4:34 p.m., beamish10@yahoo.com forwarded an email to vickentraders@aol.com with the subject line, "Fwd: Account 2[.]" The text of the forwarded email included, among other things, account information for the Bank of America account ending in #5133.

63. On or about May 13, 2014, at approximately 4:45 p.m., beamish10@yahoo.com sent and caused to be sent an email to idelsaint@gmail.com with the subject line, "Accounts[.]" The text of the email included, among other things, account information for the Bank of America account ending in #5133.

64. On or about June 2, 2014, conspirators booked flight reservations for PERRY and Z.H. to travel from Columbus, Ohio to Atlanta, Georgia on June 3, 2014.



65. On or about June 3, 2014, PERRY and Z.H. traveled from Columbus, Ohio to Atlanta, Georgia.

66. On or about June 4, 2014, the conspirators caused a wire transfer of approximately \$82,485 from B.S. into the Bank of America account ending in #5133.

67. On or about June 17, 2014, PERRY opened a business checking account ending in #8854 in the name of Top Notch Fitness and Nutrition at PNC Bank in Youngstown, Ohio.

68. On or about July 11, 2014, the conspirators sent and caused to be sent an email from hallmark\_f@yahoo.ca to ikelo1010@yahoo.ca with the subject line, "ro ro[.]" The text of the email included account information for the Bank of America account ending in #5133.

69. On or about July 23, 2014, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to smithbagzona@yahoo.co.uk with the subject line, "Account[.]" The text of the email included account information for the Citizens Bank account ending in #1612.

70. On or about July 30, 2014, the conspirators caused a wire transfer of approximately \$5,000 into the Citizens Bank account ending in #1612, which funds were fraudulently diverted from an account of A.H.

71. On or about August 1, 2014, the conspirators caused a wire transfer of approximately \$12,000 into the Citizens Bank account ending in #1612, which funds were fraudulently diverted from the account of M.M.

72. On or about August 21, 2014, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to hallmark\_f@yahoo.ca providing account information for the Citizens Bank account ending in #1612.

73. On or about August 29, 2014, the conspirators fraudulently attempted to cause a wire transfer of approximately \$180,000 from a law firm in Mt. Vernon, Illinois into the Citizens Bank account ending in #1612.

74. On or about September 12, 2014, the conspirators caused a wire transfer of approximately \$120,000 into the Citizens Bank account ending in #1612, which funds were fraudulently diverted from a law firm in Chicago, Illinois.

75. On or about September 19, 2014, at approximately 11:28 a.m., the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to akyle46@mail.com with the subject line, "Acc[.]" The text of the email included account information for the Citizens Bank account ending in #1612.

76. On or about September 19, 2014, at approximately 5:28 p.m., the conspirators sent and caused to be sent an email from akyle46@mail.com to ikelo1010@yahoo.ca with the subject line, "Re: Acc[.]" The text of the email included "Check the attachment for the slip." The attachment to the email was an image of a wire transfer request in the amount of \$5,300 into the Citizens Bank account ending in #1612.

**Joseph Joe, III**

77. On or about February 13, 2013, JOE opened a business checking account ending in #0310 in the name of Joseph Joe, III d/b/a Cover Klein Investment Co. at Huntington Bank in the Youngstown, Ohio area.

78. After opening the account, JOE and others provided the account information to the conspirators.

79. On or about February 14, 2013, the conspirators caused a wire transfer of approximately \$200,000 into the Huntington Bank account ending in #0310, which funds were fraudulently diverted from an investment account.

80. On or about February 25, 2013, JOE opened a business checking account ending in #3266 in the name of Joseph Joe, III d/b/a Cover Klein Investments at Citizens Bank in the Youngstown, Ohio area.

81. After opening the account, JOE and others provided the account information to the conspirators.

82. Between on or about February 25, 2013, and on or about February 26, 2013, the conspirators emailed and caused to be emailed to each other account information for the Citizens Bank account ending in #3266.

83. On or about February 28, 2013, the conspirators caused a wire transfer of approximately \$215,000 into the Citizens Bank account ending in #3266, which funds were fraudulently diverted from a financial services company located in Santa Barbara, California.

**William Howell**

84. On or about January 10, 2015, the conspirators emailed and caused to be emailed between each other an email message with the subject: "This are d names for the aza." The content of the email included the following: "1: [R.L.] 2: [M.H.] 3: [T.S.] 4: TOYOTA TSHUSHO PETROLEUM PTE LTD 5: Chimbusco Pan Nation Petro-Chemical Co., LLC."

85. On or about January 12, 2015, the conspirators incorporated or caused to be incorporated the company Thomas Spackman LLC in the State of Georgia. The conspirators registered or caused to be registered the organization in the name of WILLIAM HOWELL.

86. On or about January 12, 2015, the conspirators emailed and caused to be emailed between each other the Internal Revenue Service Employer Identification Forms for Thomas Spackman LLC.

87. On or about February 6, 2015, the conspirators emailed and caused to be emailed between each other incorporation documents for Thomas Spackman LLC.

88. On or about February 10, 2015, HOWELL opened business checking accounts in the name of Thomas Spackman LLC at Regions Bank (account ending in #1827) and Bank of America (account ending in #8976). HOWELL opened both accounts at bank branches located in Atlanta, Georgia.

89. After opening the accounts, HOWELL and others provided the account information to the conspirators.

90. Between on or about February 11, 2015, and on or about February 23, 2015, the conspirators emailed between each other, among other things, account information for the Regions Bank account ending in #1826.

91. On or about February 26, 2015, the conspirators caused a wire transfer of approximately \$31,886.20 into the Regions Bank account ending in #1827, which funds the conspirators fraudulently diverted from a company located in Harrisburg, Pennsylvania.

92. On or about February 27, 2015, the conspirators emailed and caused to be emailed between each other confirmation of the \$31,886.20 wire transfer into the Regions Bank account ending in #1827.

93. Also on or about February 27, 2015, the conspirators caused a wire transfer of approximately \$190,000 into the Regions Bank account ending in #1827, which funds were fraudulently diverted from a title company located in Fort Stockton, Texas.

94. On that same date, HOWELL deposited a cashier's check in the approximate amount of \$22,000 into the Regions Bank account ending in #1827.

95. On or about March 3, 2015, the conspirators emailed and caused to be emailed between each other account information for the Bank of America account ending in #8976 and information regarding the \$31,886.20 wire transfer into the Regions Bank account ending in #1827.

96. On or about March 4, 2015, the conspirators caused a wire transfer of approximately \$190,000 into the Bank of America account ending in #8976, which funds were fraudulently diverted from an escrow service located in Austin, Texas.

**Terry Marlowe**

97. On or about March 11, 2013, MARLOWE opened a business checking account ending in #2749 in the name of T Marlowe Distribution at Talmer Bank in Youngstown, Ohio.

98. After opening the account, MARLOWE and others provided the account information to the conspirators.

99. On or about April 17, 2013, the conspirators sent and caused to be sent an email from juansanchez30@hotmail.com to ikelo1010@yahoo.ca. The email contained the statement "1822823 Ontario Inc. You can use any address."

100. On or about April 22, 2013, MARLOWE opened a business checking account ending in #5111 at Huntington Bank in Youngstown, Ohio.

101. After opening the account, MARLOWE and others provided the account information to the conspirators.

102. On or about April 22, 2013, MARLOWE opened a business checking account ending in #2578 in the name of 1822823 Ontario, Inc. at Huntington Bank in Youngstown, Ohio.

103. After opening the account, MARLOWE and others provided the account information to the conspirators.

104. On or about April 22, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to rnip234@yahoo.com. The email contained account information for the Huntington Bank account ending in #2578.

105. On or about April 30, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to whogobe@yahoo.com providing account information for the PNC Bank account ending in #1897 in the name of S.A. This email included a separate email between the conspirators from ikelo1010@yahoo.ca to whogobe@yahoo.com containing account information for the Huntington Bank account ending in #2823.

106. On or about May 3, 2013, MARLOWE opened a business checking account ending in #2528 in the name of 1822823 Ontario, Inc. at Chase Bank in Youngstown, Ohio.

107. After opening the account, MARLOWE and others provided the account information to the conspirators.

108. On or about May 9, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to jemes\_mass1300@yahoo.com with the subject line: "Re: Stock Account infor, [sic]." The email contained MARLOWE's personal identification information, including his name, date of birth, and social security number.

109. On or about May 22, 2013, the conspirators caused two wire transfers of approximately \$5,900 and \$10,500 into the Chase Bank account ending in #2528, which funds were fraudulently diverted from M.B.

110. On or about May 29, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to youngbrandy22@yahoo.ca copying smithbagzona@yahoo.co.uk

with the subject line: "Account." The email provided account information for the Huntington Bank account ending in #2823.

111. On or about June 15, 2013, the conspirators sent and caused to be sent an email from youngbrandy22@yahoo.ca to ikelo1010@yahoo.ca with the subject line: "Fw: Attached Document." The email contained an image of a transaction receipt showing a \$21,000 wire transfer occurring on June 14, 2013, from an account at Kirtland Federal Credit Union, Albuquerque, New Mexico into the Huntington Bank account ending in #2823.

112. On that same date, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to tru.levi@ymail.com, forwarding the same image of the receipt from Kirtland Federal Credit Union.

113. On or about July 29, 2013, MARLOWE opened a business checking account ending in #6590 in the name of 1822823 Ontario, Inc. at Huntington Bank in Youngstown, Ohio.

114. After opening the account, MARLOWE and others provided the account information to the conspirators.

115. On or about July 29, 2013, MARLOWE deposited a counterfeit, altered or otherwise unauthorized check in the amount of \$621,929.97, which purported to be from a supermarket company in Canada, into the Huntington Bank account ending in #6590.

116. Between on or about September 4, 2013 and September 18, 2013, the conspirators sent and caused to be sent emails between each other providing, among other things, account information for the Talmer Bank account ending in #2749.

117. On or about September 19, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to ogede\_virgin@yahoo.com with the subject line, "Re: URGENT." The content of the email included account information for the Talmer Bank



account ending in #2749 and a Scotia Bank business account in the name of SF Ideal Trades, controlled by the conspirators.

118. On or about September 19, 2013, the conspirators sent and caused to be sent an email to each other that stated, among other things, "This One for Big Money," and provided account information for the Talmer Bank account ending in #2749.

119. Between on or about September 19, 2013, and October 2, 2013, the conspirators sent and caused to be sent emails between each other containing account information for the Talmer Bank account ending in #2749.

120. On or about October 9, 2013, the conspirators caused a wire transfer of approximately \$27,269.99 into the Talmer Bank account ending in #2749, which funds were fraudulently diverted from a company in Brussels, Belgium.

121. On or about October 30, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to hallmark\_f@yahoo.ca with the subject line, "Re: ifo." The content of the email provided "terry Marlowe ##### Mcguffey rd Youngstown [Zip Code #####] Dob :x-xx-64 SSN: #####1540 Call the bank."

122. On or about January 18, 2014, the conspirators sent and caused to be sent an email from ekenwan@yahoo.com to ikelo1010@yahoo.ca with the subject line, "SSN FOR THE USAA." The content of the email provided the number "#####8441" and account information for the Talmer Bank account ending in #2749.

**Emmett Conner, Sr.**

123. On or about April 23, 2014, the conspirators caused to be incorporated Shore's Manufacturing, Inc. as a Domestic Profit Organization in the State of Georgia. The conspirators caused the organization to be registered in the name of EMMETT CONNER, SR.

124. On or about April 25, 2014, CONNER opened business checking accounts in the names of Shore's Manufacturing at Bank of America (account ending in #3318) and Wells Fargo (account ending in #8710). CONNER opened both accounts at bank branches located in Atlanta, Georgia.

125. After opening the accounts, CONNER and others provided the account information for both accounts to the conspirators.

126. On or about April 29, 2014, the conspirators caused a wire transfer of approximately \$97,250 into the Bank of America account ending in #3318, which funds were fraudulently diverted from a law firm in Lafayette, Louisiana.

127. On or about April 29, 2014, Z.H. travelled to Atlanta, Georgia.

128. On or about April 30, 2014, CONNER travelled to Atlanta, Georgia.

129. Between approximately May 19, 2014, and June 5, 2014, CONNER and others provided the conspirators the account information for the Bank of America account ending in #3318 and the Wells Fargo account ending in #8710.

130. On or about May 22, 2014, the conspirators caused an attorney in California to deposit unwittingly into her client trust account a counterfeit or altered check in the amount of \$530,000 (the "counterfeit check funds").

131. On or about May 23, 2014, the conspirators caused a wire transfer of approximately \$22,755 into the Wells Fargo account ending in #8710, which funds were fraudulently diverted from an online foreign exchange company based in Sydney, Australia.

132. On or about May 28, 2014, the conspirators attempted to cause a wire transfer of approximately \$505,000 of the counterfeit check funds into the Wells Fargo account ending in #8710.

133. On or about May 29, 2014, the conspirators caused a wire transfer of approximately \$90,648.34 into the Wells Fargo account ending in #8710, which funds were fraudulently diverted from an online foreign exchange company based in Sydney, Australia.

134. On or about May 30, 2014, CONNER and Z.H. travelled from Atlanta, Georgia to Columbus, Ohio.

**Sterling Green**

135. On or about December 6, 2012, GREEN opened a business checking account ending in #0491 in the name of Wholesale Goods at Huntington Bank in the Youngstown, Ohio area.

136. After opening the account, GREEN and others provided the account information to the conspirators.

137. On or about February 5, 2013, the conspirators caused a wire transfer of approximately \$20,500 into the Huntington Bank account ending in #0491, which funds were fraudulently diverted from a financial services firm headquartered in Des Peres, Missouri.

138. On or about February 8, 2013, the conspirators caused a wire transfer of approximately \$5,000 into the Huntington Bank account ending in #0491, which funds were fraudulently diverted from a bank account in the name of B.S.

139. On or about February 15, 2013, the conspirators caused a wire transfer of approximately \$38,000 into the Huntington Bank account ending in #0491, which funds were fraudulently diverted from a bank account in the name of M.M.

140. On or about March 8, 2013, GREEN opened a business checking account ending in #1739 in the name of Wholesale Goods at Chase Bank in Youngstown, Ohio.

141. After opening the account, GREEN and others provided the account information to the conspirators.

142. Between on or about April 3, 2013, and on or about April 25, 2013, the conspirators emailed and caused to be emailed between each other account information for the Chase Bank account ending in #1739.

143. On or about July 9, 2014, GREEN opened a business checking account ending in #7283 in the name of Wholesale Goods at PNC Bank in the Youngstown, Ohio area.

144. After opening the account, GREEN and others provided the account information to the conspirators.

145. On or about July 21, 2014, the conspirators caused a wire transfer of approximately \$53,302.10 into the PNC Bank account ending in #7283, which funds were fraudulently diverted from the account of K.B. located in Austin, Texas.

**Keisha Johnson**

146. On or about June 6, 2014, the conspirators caused to be established KMJ Wholesale LLC under the registrant name KEISHA JOHNSON.

147. On or about June 9, 2014, JOHNSON opened a business checking account ending in #8731 in the name of KMJ Wholesale LLC at Chase Bank in Columbus, Ohio.

148. After opening the account, JOHNSON and others provided the account information to the conspirators.

149. On or about August 5, 2014, JOHNSON opened a business checking account ending in #1327 in the name of KMJ Wholesale LLC at Citizens Bank in Columbus, Ohio.

150. After opening the account, JOHNSON and others provided the account information to the conspirators.

151. The same day, the conspirators exchanged an email with the subject line: “Account to deposit,” providing account information for the Citizens Bank account ending in #1327.

152. On or about August 11, 2014, the conspirators caused a wire transfer of approximately \$100,000 into the Citizens Bank account ending in #1327, which funds were fraudulently diverted from an account in the name of M.G.

153. On or about August 11, 2014, the conspirators emailed and caused to be emailed between each other account information for Huntington National Bank Hollywood Casino Columbus, which stated, “make payable to [JOHNSON].”

154. The same day, the conspirators exchanged an email with the subject line “Casino Acct,” which provided the same Hollywood Casino account information.

155. On or about September 8, 2014, JOHNSON opened a business checking account ending in #7907 in the name of KMJ Wholesale at Bank of America in Decatur, Georgia.

156. On or about September 30, 2014, the conspirators caused a wire transfer of approximately \$160,000 into the Bank of America account ending in #7907, which funds were fraudulently diverted from a law firm located in Charlotte, North Carolina.

**Kayla Neeley**

157. On or about September 26, 2013, NEELEY opened a business checking account ending in #2927 in the name of K.L. at Citizens Bank in Youngstown, Ohio.

158. After opening the account, NEELEY provided the account information to the conspirators.

159. On or about September 30, 2013, NEELEY deposited and caused to be deposited a check from "Capital Guardian Trust" in the approximate amount of \$85,000 into the Citizens Bank account ending in #2927.

160. On or about October 24, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to youngbrandy22@yahoo.ca, which provided account information for the Citizens Bank account ending in #2927.

161. On or about October 29, 2013, NEELEY deposited and caused to be deposited a counterfeit check in the approximate amount of \$74,479.86, payable to K.L., into the Citizens Bank account ending in #2927.

162. On or about October 31, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to youngbrandy22@yahoo.ca, which attached an image of the \$74,479.86 check payable to K.L.

163. On or about November 7, 2013, NEELEY deposited and caused to be deposited a counterfeit check in the approximate amount of \$422,850.33, payable to K.L., into the Citizens Bank account ending in #2927.

**Isiah Patterson, Sr.**

164. On or about May 1, 2014, PATTERSON opened a business checking account ending in #3510 in the name of V.L. at Huntington Bank in Youngstown, Ohio.

165. After opening the account, PATTERSON and others provided the account information to the conspirators.

166. On or about May 23, 2013, the conspirators caused a wire transfer of approximately \$10,000 into the Huntington Bank account ending in #3510, which funds were

fraudulently diverted from a company located in the Northern District of Ohio, Eastern Division, seeking to purchase a piece of machine equipment.

167. Between on or about August 26, 2013, and on or about September 20, 2013, the conspirators emailed between each other, among other things, account information for the Huntington Bank account ending in #3510.

168. On or about November 21, 2014, PATTERSON opened a business checking account ending in #5964 in the name of IP Export, LLC at Fifth Third Bank in the Columbus, Ohio area. After opening the account, PATTERSON and others provided the account information to the conspirators.

169. On or about November 24, 2014, PATTERSON opened a business checking account ending in #9060 in the name of IP Export, LLC at Cooper Bank in the Columbus, Ohio area.

170. After opening the account, PATTERSON and others provided the account information to the conspirators.

171. On or about December 2, 2014, conspirators fraudulently caused D.H. to wire transfer approximately \$159,629.93 into the Fifth Third account ending in #5964.

172. On or about January 21, 2015, conspirators, through an unauthorized business email intrusion, fraudulently caused a company located in Houston, Texas to attempt to wire transfer approximately \$91,620.82 into the Cooper Bank account ending in #9060.

173. On or about January 22, 2015, conspirators, through an unauthorized business email intrusion, fraudulently caused a company located in Mobile, Alabama, to attempt to wire transfer approximately \$131,740 into the Cooper Bank account ending in #9060.



174. On or about January 22, 2015, the conspirators sent and caused to be sent several emails between and among each other providing account information for the Cooper Bank account ending in #9060.

**Donald Washington, Jr.**

175. On or about February 25, 2015, WASHINGTON opened a business checking account ending in #7193 in the name of D. Washington Real Estate, LLC at Chase Bank in the Youngstown, Ohio area.

176. After opening the account, WASHINGTON and others provided the account information to the conspirators.

177. On or about May 18, 2015, WASHINGTON deposited and caused to be deposited a counterfeit check in the approximate amount of \$204,060.39 into the Chase Bank account ending in #7193.

178. On or about April 23, 2015, WASHINGTON opened a business checking account ending in #4766 in the name of D. Washington Real Estate, LLC at Fifth Third Bank in Cleveland, Ohio.

179. After opening the account, WASHINGTON and others provided the account information to the conspirators.

180. On or about April 27, 2015, the conspirators, posing as Fifth Third customer M.W., fraudulently caused an email to be sent to a private banker at Fifth Third requesting an unauthorized transfer in the approximate amount of \$250,032.45 from M.W.'s account into the Fifth Third Bank account ending in #4766.

**Terrence Phillips**

181. On or about September 18, 2013, TERRENCE PHILLIPS (“T. PHILLIPS”) opened a business checking account ending in #3345 in the name “Doing Right” at Citizens Bank in Youngstown, Ohio.

182. After opening the account, T. PHILLIPS and others provided the account information to the conspirators.

183. On or about September 23, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to youngbrandy22@yahoo.ca providing account information for the Citizens Bank account ending in #3345.

184. On or about September 29, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to idlesaint@gmail.com providing account information for the Citizens Bank account ending in #3345.

185. On or about September 30, 2013, the conspirators caused a wire transfer of approximately \$263,716.89 into the Citizens Bank account ending in #3345, which funds were fraudulently diverted from an attorney’s account in Barbados.

**Steve Croom, Jr.**

186. On or about November 25, 2014, the conspirators caused to be incorporated the company Bahman Larizadeh in the State of Ohio. The conspirators caused the organization to be registered in the name of STEVE CROOM, JR.

187. On or about December 2, 2014, CROOM opened a business checking account ending in #6406 in the name of Bahman Larizadeh, LLC at First National Bank.

188. After opening the account, CROOM and others provided the account information to the conspirators.

189. On or about December 3, 2014, the conspirators emailed and caused to be emailed between each other account information for the First National Bank account ending in #6406.

190. On or about December 12, 2014, the conspirators caused a wire transfer of approximately \$13,000 into the First National Bank account ending in #6406, which funds were fraudulently diverted from an escrow service located in Austin, Texas.

191. On or about December 22, 2014, the conspirators caused a wire transfer of approximately \$200,000 into the First National Bank account ending in #6406, which funds were fraudulently diverted from a law firm located in Vero Beach, Florida.

**Crystal Jefferson**

192. On or about March 4, 2013, the conspirators exchanged an email stating, "Name: [V.R.] ssn: [xxx-xx]-4092 Dob: [xx-xx]-1953 Address: [xx] Sullivan St [xxx xx] New York, NY 10012 dis na 9ook de d account but dem want first collect 47k first.... To use add d account."

193. On or about March 7, 2013, JEFFERSON opened a business checking account ending in #3470 in the name of Virginia Reath Company at Citizens Bank in the Youngstown, Ohio area.

194. After opening the account, JEFFERSON and others provided the account information to the conspirators.

195. On that same date, the conspirators exchanged an email providing account information for the Citizens Bank account ending in #3470.

196. On or about March 11, 2013, the conspirators caused a wire transfer of approximately \$45,000 into the Citizens Bank account ending in #3470, which funds were fraudulently diverted from the investment account of V.R.

197. On or about March 13, 2013, the conspirators attempted to cause a wire transfer of approximately \$90,000 into the Citizens Bank account ending in #3470, which funds were attempted to be fraudulently diverted from the investment account of V.R.

**Dulcinea Purdue**

198. On or about September 23, 2013, PURDUE opened a business checking account ending in #6062 in the name "Oracle" at Huntington Bank in Youngstown, Ohio.

199. After opening the account, PURDUE and others provided the account information to the conspirators.

200. On or about October 5, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to kbontario@yahoo.com providing account information for the Huntington Bank account ending in #6062.

201. On or about October 11, 2013, the conspirators attempted to cause a wire transfer of approximately \$167,500 into the Huntington Bank account ending in #6062, which funds were fraudulently diverted from a law firm in Charlotte, North Carolina.

202. On or about November 8, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to hallmark\_f@yahoo.ca providing account information for the Huntington Bank account ending in #6062.

203. On or about November 11, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to kbontario@yahoo.com providing account information for the Huntington Bank account ending in #6062.

204. On or about November 13, 2013, the conspirators caused a wire transfer of approximately \$119,738 into the Huntington Bank account ending in #6062, which funds were fraudulently diverted from an escrow service in San Jose, California.

205. On or about November 13, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to kbontario@yahoo.com providing account information for the Huntington Bank account ending in #6062 and attaching an image of the scheduled wire transfer from the escrow service in San Jose, California to the Huntington Bank account ending in #6062.

**Terrance Howard**

206. On or about May 3, 2013, HOWARD opened a business checking account ending in #3523 in the name of Terrance T. Howard d/b/a WH Escrow at Huntington Bank in the Youngstown, Ohio area.

207. After opening the account, HOWARD and others provided the account information to the conspirators.

208. On or about May 10, 2013, the conspirators caused a wire transfer of approximately \$10,000 into the Huntington Bank account ending in #3523, which funds were fraudulently diverted from a company located in Columbia Station, Ohio that was involved in a purported heavy machinery sale.

209. On or about March 10, 2014, HOWARD opened a business checking account ending in #1096 in the name of Terrance T. Howard d/b/a WH Escrow at Huntington Bank in the Youngstown, Ohio area.

210. After opening the account, HOWARD and others provided the account information to the conspirators.

211. On or about March 11, 2014, the conspirators caused a wire transfer of approximately \$97,750 into the Huntington Bank account ending in #1096, which funds were fraudulently diverted from a law firm in Natick, Massachusetts.

**Cobie Phillips, Jr.**

212. On or about May 20, 2014, the conspirators incorporated or caused to be incorporated the business name C L Phillips & Associates in the State of Georgia and listed the registered agent as COBIE PHILLIPS ("C. PHILLIPS").

213. On or about May 28, 2014, C. PHILLIPS opened a business checking account ending in #9075 in the name of C L Phillips & Associates at Bank of America in Atlanta, Georgia.

214. After opening the account, C. PHILLIPS and others provided the account information to the conspirators.

215. On or about June 9, 2014, the conspirators sent and caused to be sent emails between and among each other providing account information for the Bank of American account ending in #9075.

216. On or about July 11, 2014, the conspirators caused a wire transfer of approximately \$97,250 into the Bank of America account ending in #9075, which funds were fraudulently diverted from a law firm in Oklahoma.

217. On that same date, the conspirators exchanged an email containing account information for the Bank of America account ending in #9075. Attached to that email was a copy of an outgoing wire transfer request form containing the details of the \$97,250 wire transfer from the Oklahoma law firm.

**Ray Wynn**

218. On or about January 24, 2015, the conspirators incorporated and caused to be incorporated the company R A Wynn Real Estate LLC in the State of Ohio. The conspirators caused the organization to be registered in the name of WYNN.

219. On or about January 30, 2015, WYNN opened a business checking account ending in #2003 in the name of R A Wynn Real Estate LLC at First National Bank in Youngstown, Ohio.

220. After opening the account, WYNN and others provided the account information to the conspirators.

221. On or about February 2, 2015, and February 6, 2015, the conspirators sent and caused to be sent emails between and among each other providing account information for the First National Bank account ending in #2003.

222. On or about February 10, 2015, the conspirators sent and caused to be sent an email from beamish10@yahoo.com to tru.levi@ymail.com with the subject line: "Sender." The email provided the address for a law firm in Lewiston, Maine.

223. On or about February 10, 2015, the conspirators caused a wire transfer of approximately \$95,000 into the First National Bank account #2003, which funds were fraudulently diverted from a law firm in Lewiston, Maine.

**Jermaine Donlow**

224. On or about March 27, 2013, DONLOW opened an account ending in #3414 in the name of R.M. at Citizens Bank in Youngstown, Ohio.

225. After opening the account, DONLOW and others provided the account information to the conspirators.

226. Between on or about March 27, 2013 and on or about August 2, 2013, the conspirators emailed and caused to be emailed between each other account information for the Citizens Bank account ending in #3414, among other things.



227. On or about August 7, 2013, DONLOW opened a business checking account ending in #0188 in the name of N.K. at Huntington Bank in Boardman, Ohio, which is located in the Northern District of Ohio.

228. After opening the account, DONLOW and others provided the account information to the conspirators.

229. Between on or about March 27, 2013, and on or about October 15, 2013, the conspirators emailed and caused to be emailed between each other account information for the Huntington Bank account ending in #0188.

230. On or about October 17, 2013, the conspirators caused a wire transfer of approximately \$22,171.92 into the Huntington Bank account ending in #0188, which funds were fraudulently diverted from a company located in Ventura, California.

**Semira Stone**

231. On or about January 2, 2015, STONE opened a business checking account ending in #5204 in the name of On God's Time at Citizens Bank in Columbus, Ohio.

232. After opening the account, STONE and others provided the account information to the conspirators.

233. On or about February 9, 2015, the conspirators sent and caused to be sent an email from beamish10@yahoo.com to hallmark787@yahoo.com containing account information for the Citizens Bank account ending in #5204.

All in violation of Title 18, United States Code, Section 1349.

The Grand Jury further charges:

**COUNT 2**

**(Conspiracy to Commit Money Laundering, 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1957,  
in violation of 18 U.S.C. § 1956(h))**

234. The factual allegations of paragraphs 1 through 16 and 19 through 185 of this Indictment are realleged and incorporated by reference as if fully set forth herein.

235. From in or around September 2012, and continuing through approximately December 2016, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants JULIUS SMITH WILLIAMS (AKA "JOCKO"), JAMAL PERRY, JOSEPH JOE, III, WILLIAM HOWELL (AKA "RELL"), TERRY MARLOWE, EMMETT CONNER, SR., STERLING GREEN, KEISHA JOHNSON, KAYLA NEELEY, ISIAH PATTERSON, SR., TERRENCE PHILLIPS, STEVE CROOM, JR., CRYSTAL JEFFERSON, DULCINEA PURDUE, TERRANCE HOWARD, COBIE PHILLIPS, JR., RAY WYNN, JERMAINE DONLOW, SEMIRA STONE, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other to:

- a. knowing that property involved in a financial transaction represented proceeds of some form of unlawful activity, conduct and attempt to conduct such a financial transaction affecting interstate commerce that involved proceeds of specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344, knowing that the transactions were designed in whole and in part to (i) conceal and disguise the nature, location, source, ownership, and the control of proceeds of said specified unlawful activity, and (ii) avoid a transaction reporting requirement under Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i)-(ii); and
- b. knowingly engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 derived from said unlawful activity, in violation of Title 18, United States Code, Section 1957.

**Objects of the Conspiracy**

236. The objects of the conspiracy were as follows:

- a. to enrich Defendants and their co-conspirators;
- b. to conceal and disguise the fraudulent nature and character of proceeds obtained from a scheme to commit wire fraud and bank fraud, and conceal the ultimate recipients of such proceeds;
- c. to transfer \$10,000 or more at a time of proceeds obtained from a scheme to commit wire fraud and bank fraud for the foregoing purposes; and
- d. to obstruct the investigation and prosecution of the conspirators.

**Manner and Means of the Conspiracy**

237. The manner and means by which the conspirators sought to accomplish the conspiracy included, among others, the following:

- a. Conspirators obtained proceeds of the scheme to defraud described in Count 1;
- b. The conspirators sent and caused to be sent fraudulently obtained proceeds to and from multiple financial institutions, including institutions located overseas, to conceal and disguise the source of, and hinder efforts to locate, those proceeds;
- c. Conspirators caused proceeds of the fraud scheme to be transferred, via multiple smaller transactions, out of the bank accounts that initially received proceeds ("First Tier Accounts") to other bank accounts (i) in the names of fictitious shell companies, (ii) in the names of other business entities associated with real businesses controlled by persons associated with the scheme, and (iii) in the names of persons associated with the scheme (collectively, "Second Tier Accounts"), thereby creating the false appearance of legitimate business banking activity;
- d. Conspirators caused proceeds received by Second Tier Accounts to be transferred, via multiple smaller transactions, out of the Second Tier Accounts to other bank accounts also opened in the names of fictitious shell companies, sometimes located overseas, and real businesses controlled by persons associated with the scheme, (collectively, "Third Tier Accounts"), thereby creating the false appearance of legitimate business banking activity;

- e. Conspirators structured cash withdrawals of money from First Tier Accounts, Second Tier Accounts, and Third Tier Accounts to avoid federal reporting requirements;
- f. Conspirators caused proceeds received by First Tier Accounts, Second Tier Accounts, and Third Tier Accounts to be transferred via check to themselves and other co-conspirators;
- g. Conspirators caused proceeds received by First Tier Accounts, Second Tier Accounts, and Third Tier Accounts to be used to make purchases on behalf of other co-conspirators;
- h. Conspirators traveled to bank branches located in different states to conduct transactions in accounts that had received fraudulently obtained funds;
- i. Conspirators used proceeds of the scheme to defraud to pay expenses related to travel they conducted to further the scheme;
- j. Conspirators shared in proceeds of the fraud schemes; and
- k. Conspirators coordinated to provide false statements to law enforcement regarding the conspiracy's activities in order to obstruct the investigation and prosecution of the conspirators.

**Acts in Furtherance of the Conspiracy**

238. In furtherance of the conspiracy and to effect its unlawful object, Defendants committed, and caused to be committed, the following acts in furtherance of the conspiracy in the Northern District of Ohio, and elsewhere:

**Julius Smith Williams**

239. On or about October 15, 2014, WILLIAMS made two separate cash withdrawals from the Citizens Bank account ending in #7560 in the approximate amounts of \$12,000 and \$45,010, which funds were proceeds of the scheme described in Count 1, and converted \$45,000 of the funds to a cashier's check made payable to conspirator Albert Trolio.

240. On or about October 21, 2014, WILLIAMS withdrew approximately \$5,000 in cash from the US Bank account ending in #3401, which funds were proceeds of the scheme described in Count 1.

241. On that same date, WILLIAMS caused a wire transfer of approximately \$179,850, which funds were proceeds of the scheme described in Count 1, from the US Bank account ending in #3401 to an account at Talmer Bank controlled by conspirator Albert Trolino.

242. On or about March 2, 2015, WILLIAMS caused a counter credit of approximately \$170,000 into the Bank of America account ending in #4405, which funds were proceeds of the scheme described in Count 1.

243. On or about March 9, 2015, WILLIAMS withdrew approximately \$10,000 in cash from the Bank of America account ending in #4405, which funds were proceeds of the scheme described in Count 1.

244. On or about March 10, 2015, WILLIAMS withdrew approximately \$5,000 in cash from the Bank of America account ending in #4405.

245. On that same date, WILLIAMS caused a wire transfer of approximately \$150,000, which funds were proceeds of the scheme described in Count 1, from the Bank of America account ending in #4405 to an account at First National Bank controlled by conspirator Albert Trolino.

246. On or about March 10, 2015, WILLIAMS withdrew approximately \$4,500 in cash from the Bank of America account ending in #4405, which funds were proceeds of the scheme described in Count 1.

247. On or about March 13, 2015, WILLIAMS caused a wire transfer of approximately \$150,150, which funds were proceeds of the scheme described in Count 1, from the First National Bank account ending in #2015 to an account at Wing Hang Bank in China.

248. On or about March 16, 2015, WILLIAMS withdrew in the form of a cashier's check approximately \$16,510 from the First National Bank account ending in #2015, which funds were proceeds of the scheme described in Count 1.

249. On or about March 16, 2015, WILLIAMS caused two checks to be drawn on the First National Bank account ending in #2015, payable to cash, in the approximate amounts of \$8,000 and \$5,000, which funds were proceeds of the scheme described in Count 1.

250. On or about March 17, 2015, WILLIAMS caused a check to be drawn on the First National Bank account ending in #2015, payable to cash, in the approximate amount of \$5,000, which funds were proceeds of the scheme described in Count 1.

251. On or about May 18, 2015, WILLIAMS, in Atlanta, Georgia, made two cash withdrawals of approximately \$10,000 and \$10,000 from the Bank of America account ending in #4405, which funds were proceeds of the scheme described in Count 1.

252. On that same date, WILLIAMS caused a wire transfer of approximately \$150,000, which funds were proceeds of the scheme described in Count 1, from the Bank of America account ending in #4405 to an account at First National Bank controlled by conspirator Albert Trolio.

253. On or about May 19, 2015, WILLIAMS, in Atlanta, Georgia, made two cash withdrawals of approximately \$8,000 and \$5,000 from the Bank of America account ending in #4405, which funds were proceeds of the scheme described in Count 1.

254. On or about May 19, 2015, WILLIAMS traveled from Atlanta, Georgia to Ohio.

**Jamal Perry**

255. On or about November 14, 2013, conspirators wire transferred and caused to be wire transferred approximately \$100,000 from an account at Huntington Bank controlled by one of the conspirators into the Huntington Bank account ending in #4200.

256. On or about November 15, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.com to kbontario@yahoo.com with the subject line: “2<sup>nd</sup> account[.]” The text of the email provided account information for the Huntington Bank account ending in #4200.

257. On or about November 16, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to koskos374@yahoo.com with the subject line: “Re[.]” The email contained account information for the Huntington Bank account ending in #4200, and the text, “onyem d below account no longer good just fyi.”

258. On or about June 5, 2014, PERRY withdrew approximately \$18,000 in cash from the Bank of America account ending in #5133 in Atlanta, Georgia, which funds were proceeds of the scheme described in Count 1.

259. Also on or about June 5, 2014, PERRY made a withdrawal of approximately \$62,010 from the Bank of America account ending in #5133 in the form of a cashier’s check made payable to Dean Morgan Realty, which funds were proceeds of the scheme described in Count 1.

260. On or about June 6, 2014, the conspirators made and caused to be made two separate Delta airlines purchases of approximately \$381 and \$19 from the Bank of America account ending in #5133.



261. On or about June 6, 2014, PERRY withdrew approximately \$1,800 in cash from the Bank of America account ending in #5133, in Atlanta, Georgia, which funds were proceeds of the scheme described in Count 1.

262. On or about June 9, 2014, the conspirators made and caused to be made a purchase of approximately \$199.64, at a hotel in Atlanta, Georgia, from the Bank of America account ending in #5133.

263. On or about July 31, 2014, PERRY withdrew approximately \$4,800 in cash from the Citizens Bank account ending in #1612, which funds were proceeds of the scheme described in Count 1.

264. On or about August 1, 2014, PERRY withdrew approximately \$9,000 in cash from the Citizens Bank account ending in #1612, which funds were proceeds of the scheme described in Count 1.

265. On or about August 4, 2014, PERRY separately withdrew approximately \$3,000 and \$7,900 in cash from the Citizens Bank account ending in #1612, which funds were proceeds of the scheme described in Count 1.

266. Between on or about August 19, 2014, and September 25, 2014, PERRY made approximately twelve (12) separate cash and cashier's check withdrawals totaling approximately \$80,150 from the Citizens Bank account ending in #1612, as follows:

	DATE	APPROXIMATE AMOUNT
a.	August 19, 2014	\$ 7,000
b.	August 19, 2014	\$ 3,500
c.	August 19, 2014	\$ 7,000
d.	August 19, 2014	\$ 21,000
e.	August 20, 2014	\$ 1,650
f.	September 12, 2014	\$ 7,000
g.	September 12, 2014	\$ 7,000

	DATE	APPROXIMATE AMOUNT
h.	September 15, 2014	\$ 5,000
i.	September 15, 2014	\$ 5,000
j.	September 15, 2014	\$ 3,700
k.	September 22, 2014	\$ 5,300
l.	September 25, 2014	\$ 7,000
	Total	\$ 80,150

267. On or about September 12, 2014, PERRY caused a wire transfer of approximately \$90,000, which funds were proceeds of the scheme described in Count 1, from the Citizens Bank account ending in #1612 to a business bank account controlled by conspirator Albert Trolino (previously charged).

268. On or about November 10, 2014, the conspirators caused a wire transfer of approximately \$63,897 into the PNC Bank account ending in #8854.

269. On or about November 12, 2014, PERRY withdrew approximately \$9,000 in cash from the PNC Bank account ending in #8854, which funds were proceeds of the scheme described in Count 1.

270. On or about November 12, 2014, PERRY caused a wire transfer of approximately \$30,000, which funds were proceeds of the scheme described in Count 1, from the PNC Bank account ending in #8854 to a bank account in Ontario, Canada the conspirators controlled.

271. On or about November 13, 2014, PERRY withdrew approximately \$3,800 in cash from the PNC Bank account ending in #8854, which funds were proceeds of the scheme described in Count 1.

272. On or about November 13, 2014, PERRY caused a wire transfer of approximately \$21,100, which funds were proceeds of the scheme described in Count 1, from the PNC Bank account ending in #8854 to a bank account in Ontario, Canada the conspirators controlled.

273. On or about November 19, 2014, the conspirators caused a wire transfer of approximately \$49,876.19 into the PNC Bank account ending in #8854.

274. On or about November 20, 2014, PERRY withdrew approximately \$8,000 in cash from the PNC Bank account ending in #8854, which funds were proceeds of the scheme described in Count 1.

275. On or about November 20, 2014, PERRY caused a wire transfer of approximately \$20,000, which funds were proceeds of the scheme described in Count 1, from the PNC Bank account ending in #8854 to a bank account in Ontario, Canada the conspirators controlled.

276. On or about November 21, 2014, PERRY caused a wire transfer of approximately \$19,900, which funds were proceeds of the scheme described in Count 1, from the PNC Bank account ending in #8854 to a bank account the conspirators controlled.

277. On or about March 3, 2015, conspirator Paul Lacey (previously charged) wire transferred approximately \$30,000, which funds were proceeds of the scheme described in Count 1, from a Bank of America account to PERRY's personal PNC Bank account ending in #6141.

278. Between on or about March 10, 2015 and March 18, 2015, PERRY made approximately six (6) separate cash withdrawals totaling \$29,500 from his PNC Bank account ending in #6141, which funds were proceeds of the scheme described in Count 1, as follows:

	DATE	APPROXIMATE AMOUNT
a.	March 10, 2015	\$ 5,000
b.	March 11, 2015	\$ 5,000
c.	March 12, 2015	\$ 6,000
d.	March 14, 2015	\$ 6,000
e.	March 17, 2015	\$ 6,000
f.	March 18, 2015	\$ 1,500
	Total	\$ 29,500

**Joseph Joe, III**

279. On or about February 15, 2013, JOE withdrew approximately \$4,000 in cash from the Huntington Bank account ending in #0310, which funds were proceeds of the scheme described in Count 1.

280. On that same date, JOE made three separate cash withdrawals, each in the approximate amount of \$5,000 from the Huntington Bank account ending in #0310, which funds were proceeds of the scheme described in Count 1.

281. On or about February 26, 2013, JOE withdrew approximately \$1,000 in cash from the Huntington Bank account ending in #0310, which funds were proceeds of the scheme described in Count 1.

282. On or about February 27, 2013, JOE caused a wire transfer of approximately \$150,000 from the Huntington Bank account ending in #0310, which funds were proceeds of the scheme described in Count 1, into a corporate bank account in China the conspirators controlled.

283. On or about March 1, 2013, JOE caused a wire transfer of approximately \$183,990, which funds were proceeds of the scheme described in Count 1, from the Citizens Bank account ending in #0310 into a corporate bank account in Canada the conspirators controlled.

284. On or about March 1, 2013, JOE withdrew approximately \$7,000 in cash from the Citizens Bank account ending in #3266, which funds were proceeds of the scheme described in Count 1.

285. On or about March 4, 2013, JOE withdrew approximately \$5,000 in cash from the Citizens Bank account ending in #3266, which funds were proceeds of the scheme described in Count 1.

286. On that same date, JOE transferred approximately \$1,000 from the Citizens Bank account ending in #3266 into his personal checking account ending in #8528.

287. On or about March 5, 2013, JOE withdrew approximately \$5,000 in cash from the Huntington Bank account ending in #0310, which funds were proceeds of the scheme described in Count 1.

288. On or about March 6, 2013, JOE withdrew approximately \$10,000 in cash from the Citizens Bank account ending in #3266, which funds were proceeds of the scheme described in Count 1.

**William Howell**

289. On or about February 27, 2015, HOWELL withdrew approximately \$8,000 in cash from the Regions Bank account ending in #1827, which funds were proceeds of the scheme described in Count 1.

290. On that same date, the conspirators caused a cashier's check in the approximate amount of \$22,000, which funds were proceeds of the scheme described in Count 1, to be drawn on the Regions Bank account ending in #1827, payable to a shell company the conspirators created.

291. On or about March 2, 2015, the conspirators emailed and caused to be emailed between each other account information for the Regions Bank account ending in #1827.

292. On or about March 3, 2015, HOWELL made two separate cash withdrawals in the approximate amounts of \$1,000 and \$7,000 from the Regions Bank account ending in #1827, which funds were proceeds of the scheme described in Count 1.

293. On that same date, HOWELL made a cashier's check withdrawal in the approximate amount of \$22,000, payable to conspirator B.J.

294. On that same date, HOWELL caused a check to be drawn on the Regions Bank account ending in #1827 in the approximate amount of \$13,008, payable to his wife, S.H., which funds were proceeds of the scheme described in Count 1.

295. Also on that same date, HOWELL caused a cashier's check to be drawn on the Regions Bank account ending in #1827 in the approximate amount of \$170,000 payable to Toyota Tshusho Petroleum LTD, which funds were proceeds of the scheme described in Count 1.

296. On or about March 5, 2015, HOWELL made two separate cash withdrawals from the Bank of America account ending in #8976 in the approximate amounts of \$10,000 and \$5,000, which funds were proceeds of the scheme described in Count 1.

297. On or about March 6, 2015, HOWELL, Z.H., and WILLIAMS travelled from Atlanta, Georgia to Pittsburgh, Pennsylvania.

298. On that same date, HOWELL withdrew approximately \$10,000 in cash from the Bank of America account ending in #8976, which funds were proceeds of the scheme described in Count 1.

299. The conspirators purchased and caused to be purchased the airline flights for HOWELL, Z.H., and WILLIAMS through a debit card associated with the Bank of America account ending in #8976.

300. On or about March 9, 2015, the conspirators made and caused to be made two separate Delta airlines purchases of approximately \$715.10 each from the Bank of America account ending in #8976.

301. On or about March 9, 2015, the conspirators made and caused to be made two separate purchases of approximately \$218.44 and \$236.91, at a hotel in Atlanta, Georgia, from the Bank of America account ending in #8976.

302. On or about March 11, 2015, HOWELL caused a wire transfer of approximately \$140,000 from the Bank of America Account ending in #8976, which funds were proceeds of the scheme described in Count 1, into an account the conspirators controlled located at Zhejiang Rural Commercial Bank in China.

303. On or about March 11, 2015, HOWELL travelled from Atlanta, Georgia to Pittsburgh, Pennsylvania.

304. On or about March 12, 2015, HOWELL used the bank card associated with the Bank of America account ending in #8976 to purchase an airline ticket in the approximate amount of \$565.10, which funds were proceeds of the scheme described in Count 1.

**Terry Marlowe**

305. On or about May 23, 2013, MARLOWE withdrew approximately \$5,500 in cash from the Chase Bank account ending in #2528, which funds were proceeds of the scheme described in Count 1.

306. On or about June 18, 2013, MARLOWE made a withdrawal of approximately \$20,975 from the Huntington Bank account ending in #2578 in the form of four separate checks payable to cash, which funds were proceeds of the scheme described in Count 1.

307. On or about October 2, 2013, MARLOWE deposited a cashier's check in the approximate amount of \$14,000 into the Talmer Bank account ending in #2749, which funds were proceeds of the scheme described in Count 1.



308. On or about October 4, 2013, MARLOWE withdrew approximately \$14,000 in cash from the Talmer Bank account ending in #2749, which funds were proceeds of the scheme described in Count 1.

309. On or about October 17, 2013, MARLOWE opened a business checking account ending in #8910 in the name of Terry Marlow dba Marlowe Distribution at a Citizens Bank branch located in Youngstown, Ohio.

310. After opening the account, MARLOWE provided the account information to the conspirators.

311. On or about October 17, 2013, MARLOWE deposited a cashier's check in the approximate amount of \$27,321.16 into the Citizens Bank account ending in #8910, which funds were proceeds of the scheme described in Count 1.

312. On or about October 17, 2013, MARLOWE deposited a cashier's check in the approximate amount of \$15,000 into the Citizens Bank account ending in #8910, which funds were proceeds of the scheme described in Count 1.

313. On or about October 24, 2013, MARLOWE wire transferred approximately \$24,000, which funds were proceeds of the scheme described in Count 1, from the Citizens Bank account ending in #8910, in Youngstown, Ohio, to an account the conspirators controlled at Evergrowing Bank in Suzhou, China.

314. On that same date, MARLOWE withdrew \$2,500 in cash from the Citizens Bank account ending in #8910, which funds were proceeds of the scheme described in Count 1.

315. On or about October 25, 2013, the conspirators sent and caused to be sent an email from [steve3332@ymail.com](mailto:steve3332@ymail.com) to [ikelo1010@yahoo.ca](mailto:ikelo1010@yahoo.ca) with the subject line: "24,000." The

email included an attachment detailing a wire transfer of \$24,000 from the Citizens Bank account ending in #8910 to an account at the Evergrowing Bank in Suzhou, China.

**Emmett Conner, Sr.**

316. On or about April 30, 2014, CONNER withdrew approximately \$7,000 from the Bank of America account ending in #3318, which funds were proceeds of the scheme described in Count 1.

317. On or about May 1, 2014, CONNER and Z.H. travelled from Atlanta, Georgia to Columbus, Ohio.

318. On that same date, CONNER withdrew approximately \$7,000 in cash from the Bank of America Account ending in #3318, which funds were proceeds of the scheme described in Count 1.

319. On or about May 28, 2014, CONNER made two cash withdrawals in the approximate amounts of \$5,000 and \$17,510 from the Wells Fargo account ending in #8710, which funds were proceeds of the scheme described in Count 1.

320. On or about May 30, 2014, CONNER and Z.H. travelled from Atlanta, Georgia to Columbus, Ohio.

321. On that same date, CONNER made withdrawals in the approximate amounts of \$1,500, \$18,000, and \$70,010 from the Wells Fargo account ending in #8710, which funds were proceeds of the scheme described in Count 1.

**Sterling Green**

322. On or about February 11, 2013, GREEN caused a wire transfer of approximately \$22,500 into the Wells Fargo account ending in #8723 in the name of Hanson International of Hong Kong.

323. On or about February 14, 2013, GREEN withdrew approximately \$1,500 in cash from the Huntington Bank account ending in #0491, which funds were proceeds of the scheme described in Count 1.

324. On or about February 15, 2013, GREEN withdrew approximately \$1,500 in cash from the Huntington Bank account ending in #0491, which funds were proceeds of the scheme described in Count 1.

325. On or about May 13, 2014, GREEN withdrew approximately \$3,000 in cash from the Chase Bank account ending in #1739, which funds were proceeds of the scheme described in Count 1.

326. On or about September 17, 2014, GREEN opened a business checking account ending in #6398 in the name of Wholesale Goods at Key Bank in the Youngstown, Ohio area.

327. After opening the account, GREEN and others provided the account information to the conspirators.

328. On or about September 23, 2014, GREEN caused a deposit of approximately \$7,000 into the Key Bank account ending in #6398, which funds were proceeds of the scheme described in Count 1.

329. On that same date, GREEN withdrew approximately \$7,000 from the Key Bank account ending in #6398, which funds were proceeds of the scheme described in Count 1.

**Keisha Johnson**

330. On or about August 11, 2014, JOHNSON made two withdrawals in the approximate amounts of \$7,000 and \$2,000 from the Citizens Bank account ending in #1327, which funds were proceeds of the scheme described in Count 1.

331. On that same date, JOHNSON withdrew approximately \$60,000 from the Citizens Bank account ending in #1327 in the form of a cashier's check made payable to Hollywood Casino, which funds were proceeds of the scheme described in Count 1.

332. On or about August 12, 2014, JOHNSON deposited the \$60,000 cashier's check payable to Hollywood Casino back into the Citizens Bank account ending in #1327.

333. On that same date, on or about August 12, 2014, JOHNSON caused a wire transfer of approximately \$65,000, which funds were proceeds of the scheme described in Count 1, from the Citizens Bank account ending in #1327 into the account of the Hollywood Casino located in Columbus, Ohio.

334. On or about August 13, 2014, JOHNSON withdrew approximately \$5,000 from the Citizens Bank account ending in #1327, which funds were proceeds of the scheme described in Count 1.

335. On that same date, JOHNSON withdrew approximately \$20,000 from the Citizens Bank account ending in #1327 in the form of a cashier's check made payable to Horseshoe Cleveland.

336. On or about August 14, 2014, JOHNSON deposited the \$20,000 cashier's check payable to Horseshoe Casino back into the Citizens Bank account ending in #1327.

337. On or about September 30, 2014, the conspirators caused a wire transfer of approximately \$160,000 into the Bank of America account ending in #7907, which funds were fraudulently diverted from a law firm located in Charlotte, North Carolina.

338. On or about October 1, 2014, JOHNSON made two withdrawals in the approximate amounts of \$7,000 and \$9,000 from the Bank of America account ending in #7907, which funds were proceeds of the scheme described in Count 1.

339. On or about October 2, 2014, JOHNSON made two withdrawals in the approximate amounts of \$6,000 and \$7,000 from the Bank of America account ending in #7907, which funds were proceeds of the scheme described in Count 1.

340. On that same date, JOHNSON withdrew approximately \$100,010 from the Bank of America account ending in #7907 in the form of a cashier's check made payable to conspirator Albert Trolio, which funds were the proceeds of the scheme described in Count 1.

341. On or about October 3, 2014, JOHNSON withdrew approximately \$16,000 from the Chase Bank account ending in #8731, which funds were proceeds of the scheme described in Count 1.

**Kayla Neeley**

342. On or about October 7, 2013, NEELEY withdrew approximately \$70,000 from the Citizens Bank account ending in #2927 in the form of an official check payable to conspirator Mark Gregory, which funds were proceeds of the scheme described in Count 1.

343. On or about October 7, 2013, NEELEY withdrew approximately \$6,000 in cash from the Citizens Bank account ending in #2927, which funds were proceeds of the scheme described in Count 1.

344. Between on or about October 7, 2013 and October 15, 2013, NEELEY made approximately 15 separate cash withdrawals totaling \$8,650 from the Citizens Bank account ending in #2927, as follows:

	DATE	APPROXIMATE AMOUNT
a.	October 7, 2013	\$ 603
b.	October 7, 2013	\$ 603
c.	October 7, 2013	\$ 603
d.	October 7, 2013	\$ 503
e.	October 8, 2013	\$ 603

	DATE	APPROXIMATE AMOUNT
f.	October 8, 2013	\$ 603
g.	October 8, 2013	\$ 603
h.	October 9, 2013	\$ 603
i.	October 9, 2013	\$ 603
j.	October 10, 2013	\$ 603
k.	October 10, 2013	\$ 603
l.	October 10, 2013	\$ 603
m.	October 15, 2013	\$ 603
n.	October 15, 2013	\$ 603
o.	October 15, 2013	\$ 308
	Total	\$ 8,650

**Isiah Patterson, Sr.**

345. On or about May 1, 2013, PATTERSON opened a business checking account ending in #3510 at Huntington Bank in Youngstown, Ohio.

346. After opening the account, PATTERSON and others provided the account information to the conspirators.

347. On or about May 2, 2013, PATTERSON deposited approximately \$16,500 in cash into the Huntington Bank account ending in #3510, which funds were proceeds of the scheme described in Count 1.

348. On or about May 3, 2013, PATTERSON wire transferred approximately \$16,000 from the Huntington Bank account ending in #3510 to a Bank of China account in the name of Hanson International.

349. On or about May 15, 2013, PATTERSON deposited approximately \$5,000 in cash into the Huntington Bank Account ending in #3510, which funds were proceeds of the scheme described in Count 1.

350. On or about May 16, 2013, PATTERSON wrote a check payable to himself, drawn on the Huntington Bank account ending in #3510, in the approximate amount of \$2,440.53, which funds were proceeds of the scheme described in Count 1.

351. On or about May 20, 2013, PATTERSON wire transferred approximately \$5,000 from the Huntington Bank account ending in #3510 to a bank account in China in the name of Mega Plastics Company Ltd, which funds were proceeds of the scheme described in Count 1.

352. Between on or about August 26, 2013 and on or about September 2, 2013, the conspirators sent and caused to be sent several emails between and among each other providing account information for the Huntington Bank account ending in #3510.

353. On or about September 12, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to boc\_telxdepartment@live.cn with the subject line, "Accounts." The content of the email provided account information for the Huntington Bank account ending in #3510, as well as several other bank accounts the conspirators controlled.

354. Between on or about September 16, 2013, and on or about September 20, 2013, the conspirators sent and caused to be sent emails between and among each other providing, among other things, account information for the Huntington Bank account ending in #3510.

355. On or about October 7, 2013, PATTERSON deposited approximately \$6,030 in cash into the Huntington Bank account ending in #3510, which funds were proceeds of the scheme described in Count 1.

356. On or about October 9, 2013, PATTERSON withdrew approximately \$5,883 in cash from the Huntington Account ending in #3510, which funds were proceeds of the scheme described in Count 1.



**Terrence Phillips**

357. On or about September 18, 2013, T. PHILLIPS opened a business checking account ending in #3345 in the name "Doing Right" at Citizens Bank in Youngstown, Ohio.

358. After opening the account, T. PHILLIPS and others provided the account information to the conspirators.

359. On or about September 23, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to youngbrandy22@yahoo.ca providing account information for the Citizens Bank account ending in #3345.

360. On or about September 29, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to idlesaint@gmail.com providing account information for the Citizens Bank account ending in #3345.

361. On or about October 1, 2013, T. PHILLIPS caused a wire transfer of approximately \$180,000, which funds were proceeds of the scheme described in Count 1, from the Citizens Bank account ending in #3345 to the Cortland Bank account ending in #4407 controlled by conspirator Anthony Trolino.

362. On or about October 1, 2013, T. PHILLIPS withdrew approximately \$60,000 from the Citizens Bank account ending in #3345 in the form of an official check payable to conspirator Mark A. Gregory, which funds were proceeds of the scheme described in Count 1.

363. On or about October 1, 2013, T. PHILLIPS withdrew approximately \$7,000 in cash from the Citizens Bank account ending in #3345, which funds were proceeds of the scheme described in Count 1.

364. On or about October 2, 2013, T. PHILLIPS withdrew approximately \$14,010 from the Citizens Bank account ending in #3345 in the form of an official check payable to MARLOWE, which funds were proceeds of the scheme described in Count 1.

365. On or about October 3, 2013, T. PHILLIPS withdrew approximately \$2,000 in cash from the Citizens Bank account ending in #3345, which funds were proceeds of the scheme described in Count 1.

366. On or about October 3, 2013, T. PHILLIPS withdrew approximately \$698.98 from the Citizens Bank account ending in #3345 in the form of an official check payable to T. PHILLIPS, which funds were proceeds of the scheme described in Count 1.

**Steve Croom, Jr.**

367. On or about December 15, 2014, CROOM caused two checks to be drawn on the First National Bank account ending in #6406, payable to cash, in the approximate amounts of \$8,500 and \$4,000, which funds were proceeds of the scheme described in Count 1.

368. On or about December 22, 2014, CROOM caused a check to be drawn on the First National Bank account ending in #6406, payable to cash, in the approximate amount of \$7,000, which funds were proceeds of the scheme described in Count 1.

**Crystal Jefferson**

369. On or about March 12, 2013, JEFFERSON caused a wire transfer of approximately \$36,000 from the Citizens Bank account ending in #3470, which funds were proceeds of the scheme described in Count 1, into an account the conspirators controlled in Toronto, Canada.

370. On that same date, JEFFERSON withdrew approximately \$3,000 in cash from the Citizens Bank account ending in #3470, which funds were proceeds of the scheme described in Count 1.

**Dulcinea Purdue**

371. On or about November 14, 2013, PURDUE caused a wire transfer of approximately \$100,000, which funds were proceeds of the scheme described in Count 1, from the Huntington Bank account ending in #6062 to the Huntington Bank account ending in #4200 controlled by PERRY.

372. On that same date, PURDUE withdrew approximately \$7,000 in cash from the Huntington Bank account ending in #6062, which funds were proceeds of the scheme described in Count 1.

373. On or about November 15, 2013, the conspirators sent and caused to be sent an email from ikelo1010@yahoo.ca to kbontario@yahoo.com with the subject line: "aza details[.]" The content of the email included, among other things, PURDUE's name, social security number, and date of birth, as well as a statement to call Huntington Bank.

374. On or about November 20, 2013, the conspirators sent and caused to be sent an email from levelplace@yahoo.com to mails4tim@yahoo.com with the subject line: "Re: New Jobs[.]" The email included a previous email providing account information for the Huntington Bank account ending in #6062.

**Terrance Howard**

375. On or about May 10, 2013, HOWARD withdrew approximately \$6,000 in cash from the Huntington Bank account ending in #3523, which funds were proceeds of the scheme described in Count 1.

376. On or about May 13, 2013, HOWARD withdrew approximately \$4,000 in cash from the Huntington Bank account ending in #3523, which funds were proceeds of the scheme described in Count 1.

377. On or about March 11, 2014, HOWARD withdrew approximately \$6,000 in cash from the Huntington Bank account ending in #1096, which funds were proceeds of the scheme described in Count 1.

**Cobie Phillips, Jr.**

378. On or about July 14, 2014, the conspirators made and caused to be made a Delta airlines purchase of approximately \$490 from the Bank of America account ending in #9075.

379. On or about July 14, 2014, C. PHILLIPS withdrew, in the form of a check card purchase from Trolio's Auto Specialists in Youngstown, Ohio, approximately \$16,516.76 from the Bank of America account ending in #9075, which funds were proceeds of the scheme described in Count 1.

**Ray Wynn**

380. On or about February 10, 2015, WYNN withdrew approximately \$37,000 from the First National Bank account ending in #2003, which funds were proceeds of the scheme described in Count 1, and used a portion of the funds to purchase a cashier's check in the amount of \$30,000 payable to K.H.

381. On or about February 11, 2015, WYNN wire transferred approximately \$49,000, which funds were proceeds of the scheme described in Count 1, from the First National Bank account ending #2003 to the Citizens Bank account ending in #5204 controlled by STONE.

382. On or about February 11, 2015, WYNN withdrew approximately \$5,500 in cash from the First National Bank account ending #2003, which funds were proceeds of the scheme described in Count 1.

383. On or about February 12, 2015, WYNN withdrew approximately \$3,000 from the First National Bank account ending #2003 in the form of an official check payable to WYNN, which funds were proceeds of the scheme described in Count 1.

**Jermaine Donlow**

384. On or about October 7, 2013, DONLOW made three separate cash withdrawals in the approximate amounts of \$3,000, \$4,900, and \$100 from the Huntington Bank account ending in #0188, which funds were proceeds of the scheme described in Count 1.

385. On or about October 18, 2013, DONLOW made two separate cash withdrawals in the amounts of \$1,600 and \$5,000 from the Huntington Bank account ending in #0188, which funds were proceeds of the scheme described in Count 1.

386. On that same date, DONLOW withdrew approximately \$15,006 from the Huntington Bank account ending in #0188 in the form of a cashier's check made payable to MARLOWE.

**Semira Stone**

387. On or about February 11, 2015, WYNN wire transferred approximately \$49,000, which funds were proceeds of the scheme described in Count 1, from the First National Bank account ending #2003 to the Citizens Bank account ending in #5204.

388. On or about February 12, 2015, STONE withdrew approximately \$8,000 from the Citizens Bank account ending in #5204, which funds were the proceeds of the scheme described in Count 1.

389. On or about February 13, 2015, STONE withdrew approximately \$7,000 from the Citizens Bank account ending in #5204, which funds were the proceeds of the scheme described in Count 1.

390. On or about February 17, 2015, the conspirators sent and caused to be sent an email from beamish10@yahoo.com to tru.levi@ymail.com containing account information for a Bank of America account in the name of M.B.

391. On or about February 17, 2015, STONE initiated a wire transfer of approximately \$31,000, which funds were the proceeds of the scheme described in Count 1, from the Citizens Bank account ending in #5204 to an account at Bank of America for the beneficiary, M.B. (the "M.B. Bank of America account").

392. On or about February 17, 2015, the conspirators sent and caused to be sent an email from zhowell8@icloud.com to beamish10@yahoo.com with no subject line, containing images of bank records showing a wire transfer request from the Citizens Bank account ending in #5204 to the M.B. Bank of America account in the amount \$31,000.

393. On or about February 24, 2015, the conspirators caused a wire transfer of approximately \$50,000 into the Citizens Bank account ending in #5204, which funds were proceeds of the scheme described in Count 1, that is, a counterfeit check the conspirators fraudulently deposited and caused to be deposited into a Banco Monex account in Mexico in the name of Servicios Integrados En Sistemas De Av Republic of Chile.

394. On or about February 26, 2015, the conspirators sent and caused to be sent an email from mthomas7720@yahoo.com to beamish10@yahoo.com with the subject line: "50k

Orden De Pago 18087644” containing bank transaction details for the \$50,000 wire transfer into the Citizens Bank account ending in #5204 from the Banco Monex account.

All in violation of Title 18, United States Code, Section 1956(h).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.